

REMARKS

Reconsideration and allowance of the above-identified application are respectfully requested. Claims 4, 7 and 11 remain pending, wherein claims 7 and 11 are amended.

Claims 4, 7 and 11 are rejected under 35 U.S.C. § 103(a) for obviousness in view of the combination of U.S. Patent No. 6,882,906 to Geisler et al. ("Geisler"), U.S. Patent Application Publication No. 2003/0144005 to Videtich ("Videtich") and U.S. Patent No. 6,198,996 to Berstis ("Berstis"). This ground of rejection is respectfully traversed.

Claim 7 is amended to recite that "the modules are arranged in functional groups that are reconfigurable by the user". Support for this amendment can be found at least at page 3, line 20-37. This feature is not disclosed or suggested by the combination of Geisler, Videtich and Berstis.

Geisler discloses a system that can activate or disable vehicle functions based on driver preferences and workload estimates; Videtich discloses a service center that can receive driver preferences; and Berstis discloses a system that allows driver preferences to be set using user identification parameters stored, for example, on a smart card. None of these patent documents even mentions the ability of the user to reconfigure functional groups of modules. Accordingly, the combination of Geisler, Videtich and Berstis does not render claim 7 obvious.

The combination of Geisler, Videtich and Berstis does not render claim 4 obvious because the combination does not disclose or suggest that “modules related to safety are modifiable only by the stationary service control center.” The Office Action relies upon Berstis for the disclosure of this element. Although Berstis discloses using security levels to control access to different preference settings, in Berstis the security levels are contained on a smart card. This requires inserting the smart card into a reader *within the vehicle*, and does not allow for different security levels for controlling access *from a remote location*. Thus, Berstis does not disclose that “modules related to safety are modifiable only by the stationary service control center.”

Additionally, based on the motivation provided by the Office Action to combine Geisler, Videtich and Berstis, one skilled in the art would not have arrived at the arrangement recited in claim 4. Specifically, the Office Action states that one skilled in the art would have been motivated “for real time control elements adjustment locally and/or remotely and restrict access to critical elements such as safety modules to proper authorities.” First, the combination of Geisler and Videtich appears to allow for real time control of adjustments locally and remotely. Thus, the functionality of first portion of the motivation is already provided by the combination of Geisler and Videtich, and it would not be necessary to further modify this combination by Berstis to achieve this functionality. Second, Berstis provides restricted access to safety modules to proper authorities using smart cards in a local manner *within the vehicle*. Thus,

even if the combination of Geisler and Videtich were modified by Berstis to restrict access to proper authorities, this combination would result in locally restricted access within the vehicle. In contrast, claim 4 recites that "modules related to safety are modifiable only by the stationary service control center."

Because the combination of Geisler, Videtich and Berstis does not disclose or suggest all of the elements set forth in claim 4, and one skilled in the art would not have been motivated to arrive at the arrangement of claim 4 for the reasons set forth in the Office Action, the combination does not render claim 4 obvious.

Claim 11 is amended to recite similar element to those discussed above with regard to claim 4, and is patentably distinguishable over the current grounds of rejection for similar reason.

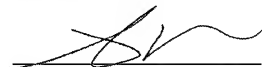
For at least those reasons set forth above, the rejection of claims 4, 7 and 11 for obviousness should be withdrawn.

If there are any questions regarding this amendment or the application in general, a telephone call to the undersigned would be appreciated since this should expedite the prosecution of the application for all concerned.

If necessary to effect a timely response, this paper should be considered as a petition for an Extension of Time sufficient to effect a timely response, and please charge any deficiency in fees or credit any overpayments to Deposit Account No. 05-1323 (Docket #095309.57224US).

Respectfully submitted,

March 6, 2009



Stephen W. Palan
Registration No. 43,420

CROWELL & MORING LLP
Intellectual Property Group
P.O. Box 14300
Washington, DC 20044-4300
Telephone No.: (202) 624-2500
Facsimile No.: (202) 628-8844
SWP:crr
7396845